

ESTTA Tracking number: **ESTTA53934**

Filing date: **11/17/2005**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	92044040
Applicant	Plaintiff KARIN MODELS, S.A.R.L. ,
Other Party	Defendant BRUNEL, JEAN LUC BRUNEL, JEAN LUC 846 LINCOLN ROAD THIRD FLOOR MIAMI BEACH, FL 33139

Motion for an Extension of Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 11/20/2005. KARIN MODELS, S.A.R.L. requests that such date be extended for 60 days, or until 01/19/2006, and that all subsequent dates be reset accordingly. The grounds for this request are as follows:

- Parties have been in settlement negotiations and thus, have not been able to complete discovery, and Petitioner recently filed a Motion for Leave to Amend, which has not yet been ruled on but consent was made of record on October 31, 2005 by Registrant. Thus, the parties anticipate that the Board will grant the motion and re-set all of the deadlines in due course. However, in an abundance of caution, Petitioner files this motion because the discovery cut off is currently set for November 20, 2005.*

KARIN MODELS, S.A.R.L. has secured the express consent of all other parties to this proceeding for the extension requested herein.

KARIN MODELS, S.A.R.L. has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/ews/

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11/17/2005